

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____	:	
RHONDA HALL,	:	
	:	
Plaintiff,	:	
	:	
V.	:	Civil Action No. 3:05-cv-30002-MAP
	:	
VERIZON COMMUNICATIONS, INC.,	:	
and VERIZON NEW ENGLAND, INC.	:	
	:	
Defendants.	:	
_____	:	

JOINT PROPOSED PRETRIAL SCHEDULE

Pursuant to L.R., D. Mass. 16.1(D), Plaintiff Rhonda Hall ("Plaintiff"), and Defendants Verizon Communications, Inc. and Verizon New England, Inc. ("Defendants"), submit the following Joint Proposed Pretrial Schedule:

1. The parties' initial disclosures pursuant to Fed. R. Civ. P. 26(a) shall be served on or before June 15, 2005.
2. All written discovery shall be served on or before August 1, 2005, 2005, and all responses thereto shall be due on the date when such responses are otherwise due under governing rules or by October 3, 2005, whichever is earlier. Notwithstanding this deadline, the parties agree that additional written discovery may be necessary as a result of information obtained during depositions. In the event those circumstances occur, written discovery will be served within ten days of the completion of the deposition, and responses will then be due as provided in the Federal Rules.
3. All non-expert depositions will be completed on or before January 2, 2006.

4. Plaintiff will serve disclosures and reports of all expert witnesses required under Fed. R. Civ. P. 26(a)(2) by February 1, 2006.
5. Defendants will serve disclosures and reports of all expert witnesses required under Fed. R. Civ. P. 26(a)(2) by March 1, 2006.
6. All expert witness depositions will be completed by April 3, 2006.
7. All motions for summary judgment will be filed on or before May 1, 2006.
8. Opposition to any Motion for Summary Judgment will be filed by June 6, 2006. Any Reply to the Opposition will be filed by June 29, 2006.
9. Should Motions for Summary Judgment not be filed by the above date, or should any such motions be denied by the court in whole or in part, the court will convene another conference to explore settlement and to establish dates for a final pretrial conference and trial.

Respectfully submitted,

RHONDA HALL

VERIZON COMMUNICATIONS, INC.
and VERIZON NEW ENGLAND,
INC.

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